

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Case No. 1:15-cv-00441

Plaintiffs,

Hon. Janet T. Neff

v.

NATIONSTAR MORTGAGE, LLC,
a limited liability company, and
JOHN DOES 1-5,

Defendants.

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)
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Nationstar Mortgage, LLC
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Grand Rapids, MI 49503
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NOTICE OF TAKING FED. R. CIV. P. 30(b)(6) DEPOSITION OF
DEFENDANT NATIONSTAR MORTGAGE, LLC

PLEASE TAKE NOTICE that Plaintiffs Bruce and Barbara Craigie (“Plaintiffs” or the “Craigies”), will, pursuant to Fed. R. Civ. P. 30(b)(6), take the deposition by oral examination of designated corporate deponent(s) of Defendant Nationstar Mortgage, LLC (“Defendant” or “Nationstar”), on Wednesday, April 20, 2016, beginning at 9:00 a.m., at the offices of Drew, Cooper & Anding, P.C., 80 Ottawa Avenue, N.W., Suite 200 Aldrich Place, Grand Rapids, MI 49503, before a Notary Public, videographer, court reporter or other such officer authorized to record depositions.

Nationstar is directed to designate a person or persons to testify on its behalf regarding the following subjects:

1. Nationstar’s loss mitigation policies and procedures in place from 2013 to present;
2. Nationstar’s loan modification policies in place from 2013 to present;
3. Nationstar’s policies and procedures in place from 2014 to present for providing information to borrowers about actions the borrower must take to be evaluated for loss mitigation options.
4. Nationstar’s policies and procedures in place from 2014 to present for providing information to borrowers about the status of loss mitigation applications.
5. Nationstar’s policies and procedures in place from 2014 to present for providing information to borrowers about the circumstances under which Nationstar would make a referral to foreclosure.
6. Nationstar’s policies and procedures in place from 2014 to present for preparing, submitting and/or retaining foreclosure pre-sale checklists, foreclosure-related affidavits, and any other pre-foreclosure documents;

7. Any and all foreclosure pre-sale checklists, foreclosure-related affidavits, and any other pre-foreclosure documents prepared during 2011 through 2014 and relating to loans serviced by Nationstar for which Plaintiff Bruce Craigie was listed as the borrower;

8. Number of residential home loans referred by Nationstar to foreclosure from 2014 to present, where a foreclosure sale took place less than 30 days after a Home Affordable Modification Program ("HAMP") rejection;

9. Number of residential home loans referred by Nationstar to foreclosure from 2014 to present, where the borrower submitted a HAMP application and a foreclosure sale took place prior to any decision on the HAMP application;

10. Number of residential home loans referred by Nationstar to foreclosure from 2014 to present, where Nationstar completed a HAMP Foreclosure Certification stating that the HAMP Foreclosure Certification had been completed no more than 7 days prior to the scheduled sale date, but the actual foreclosure sale was held more than 7 days after the certification date;

11. Nationstar's mortgage loan reinstatement policies in place between 2011 and 2014;

12. Nationstar's mortgage loan reinstatement review, HAMP review and HAMP rejection (if any) with respect to Plaintiffs' Lake Drive and Scenic Drive properties;

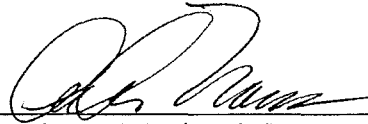
13. Nationstar's document retention policies in place between 2011 and the present;

14. Nationstar's efforts and extent of investigation in responding to Plaintiffs' First Set of Written Discovery Requests; and

15. Nationstar's efforts and extent of investigation in responding to Plaintiffs' Second Set of Written Discovery Requests.

You are invited to attend said deposition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Westbrook', is written over a horizontal line.

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)

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Dated: March 28, 2016

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